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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHAMARIAE MARSHON JONES,

Defendant.

Case No.: 2:17-cr-00042-APG-DJA

**Stipulation to Continue Sentencing
Hearing**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Allison Reese and Shaheen Torgoley, Assistant United States Attorneys, counsel for the United States of America, and Daniel Hill, counsel for Defendant SHAMARIAE MARSHON JONES, that the sentencing hearing currently scheduled for November 3, 2021 at 2:30pm, be vacated and continued two weeks or to a date and time convenient to the Court.

This Stipulation is entered into for the following reasons:

1. On September 15, 2021, the Court granted in part and denied in part, the Defendant's Motion for Acquittal. *See* ECF No. 249. That Order alters the guidelines calculations as they are presently calculated in the Presentence Investigation Report (PSR).

2. To date, the parties have not received a revised PSR, but have been advised that it is forthcoming. Without a revised PSR the parties are unable to fully prepare for the upcoming sentencing and therefore need additional time to review the revised PSR once received and prepare for the sentencing.

3. The Defendant is in custody and does not object to the continuance.

4. The parties agree to the continuance.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this Stipulation is made in good faith and not for the purposes of delay.

6. This is the second request for a continuance of the sentencing hearing.

DATED: October 26, 2021

Respectfully submitted,

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Allison Reese

ALLISON REESE
SHAHEEN TORGOLEY
Assistant United States Attorneys

/s/ Daniel Hill

Daniel Hill
Counsel for Defendant
SHAMARIAE MARSHON JONES

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 SHAMARIAE MARSHON JONES,

7 Defendant.

Case No.: 2:17-CR-00042-APG-DJA

ORDER

8 IT IS THEREFORE ORDERED that the Sentencing Hearing currently scheduled for
9 November 3, 2021, be vacated and continued to December 1, 2021 at the hour of
10 2:30 p.m., in courtroom 6C

11 DATED this 27th day of October, 2021.

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13 HONORABLE ANDREW P. GORDON
14 UNITED STATES DISTRICT JUDGE
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